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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

vs.

MARK KOZIK and
HEIDI KUNZ

) JUDGE NORGLER

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08CR 0049

) Violations: Title 18, United States Code,
) Sections 922(g)(i), 924(c), 2113(a) and 2.
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COUNT ONE MAGISTRATE JUDGE COX

The SPECIAL JUNE 2007 GRAND JURY charges:

On or about May 9, 2007, at Lakemoor, in the Northern District of Illinois, Eastern

Division,

HEIDI KUNZ,

defendant herein, by force and violence, and by intimidation, did take from the person and presence of a bank employee, approximately \$11,185.00 in United States currency belonging to and in the care, custody, control, management and possession of State Bank and Trust, located at 27444 W. Route 120, Lakemoor, Illinois, the deposits of which were then insured by the Federal Deposit Insurance Corporation;

In violation of Title 18, United States Code, Sections 2113(a) and 2.

COUNT TWO

The SPECIAL JUNE 2007 GRAND JURY further charges:

On or about May 9, 2007, at Lakemoor, in the Northern District of Illinois, Eastern Division,

HEIDI KUNZ,

defendant herein, during and in relation to a crime of violence for which defendant may be prosecuted in a court of the United States, namely, bank robbery in violation of Title 18, United States Code, Section 2113(a) as further set forth in Count One of this indictment, knowingly used and carried a firearm and, in furtherance of such crime, possessed and brandished a firearm;

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

COUNT THREE

The SPECIAL JUNE 2007 GRAND JURY further charges:

On or about July 2, 2007, at Spring Grove, in the Northern District of Illinois, Eastern Division,

HEIDI KUNZ,

defendant herein, by force and violence, and by intimidation, did take from the person and presence of a bank employee, approximately \$584 in United States currency belonging to and in the care, custody, control, management and possession of TCF Bank, located at 2401 Route 12, Spring Grove, Illinois, the deposits of which were then insured by the Federal Deposit Insurance Corporation;

In violation of Title 18, United States Code, Sections 2113(a) and 2.

COUNT FOUR

The SPECIAL JUNE 2007 GRAND JURY further charges:

On or about July 2, 2007, at Spring Grove, in the Northern District of Illinois, Eastern Division,

HEIDI KUNZ,

defendant herein, during and in relation to a crime of violence for which defendant may be prosecuted in a court of the United States, namely, bank robbery in violation of Title 18, United States Code, Section 2113(a) as further set forth in Count Three of this indictment, knowingly used and carried a firearm and, in furtherance of such crime, possessed and brandished a firearm;

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

COUNT FIVE

The SPECIAL JUNE 2007 GRAND JURY further charges:

On or about August 7, 2007, at Fox Lake, in the Northern District of Illinois, Eastern Division,

MARK KOZIK and
HEIDI KUNZ,

defendants herein, by force and violence, and by intimidation, did take from the person and presence of a bank employee, approximately \$2,502 in United States currency belonging to and in the care, custody, control, management and possession of National City Bank, located at 66 E. Grand Avenue, Fox Lake, Illinois, the deposits of which were then insured by the Federal Deposit Insurance Corporation;

In violation of Title 18, United States Code, Sections 2113(a) and 2.

COUNT SIX

The SPECIAL JUNE 2007 GRAND JURY further charges:

On or about August 7, 2007, at Fox Lake, in the Northern District of Illinois, Eastern Division,

MARK KOZIK and
HEIDI KUNZ,

defendants herein, during and in relation to a crime of violence for which defendants may be prosecuted in a court of the United States, namely, bank robbery in violation of Title 18, United States Code, Section 2113(a) as further set forth in Count Five of this indictment, knowingly used and carried a firearm and, in furtherance of such crime, possessed and brandished a firearm;

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

COUNT SEVEN

The SPECIAL JUNE 2007 GRAND JURY further charges:

On or about August 7, 2007, at Fox Lake, in the Northern District of Illinois, Eastern Division,

MARK KOZIK,

defendant herein, having been previously convicted of a crime punishable by a term of imprisonment exceeding one year, knowingly possessed a firearm, namely, one black-colored Browning .380 semiautomatic handgun, bearing serial number 03664, which firearm was in and affecting interstate commerce in that the firearm previously had traveled in interstate commerce;

In violation of Title 18, United States Code, Section 922(g)(1).

FORFEITURE ALLEGATION

The SPECIAL JUNE 2007 GRAND JURY further charges:

1. The allegations contained in Counts Two, Four, Six and Seven of this Indictment are realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c).

2. As a result of the violations of Title 18, United States Code, Sections 924(c) and 922(g)(1), as alleged in Counts Two, Four, Six and Seven of the foregoing Indictment,

MARK KOZIK and
HEIDI KUNZ,

defendants herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), any and all right, title, and interest he may have in any property involved in the charged offenses.

3. The interest of the defendants subject to forfeiture pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c) includes a black-colored Browning .380 semiautomatic handgun, bearing serial number 03664, loaded with three rounds of ammunition;

All pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c).

A TRUE BILL:

FOR PERSO N